

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**KLESTADT WINTERS JURELLER  
SOUTHARD & STEVENS, LLP**

200 West 41<sup>st</sup> Street, 17<sup>th</sup> Floor

New York, New York 10036

Telephone: (212) 972-3000

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Ian R. Winters

Brendan M. Scott

Stephanie R. Sweeney

*Counsel to Dream on Me Industries, Inc.*

In re:

BED BATH & BEYOND INC., *et al.*,

Debtors.

Chapter 11

Case No. 23-13359 (VFP)

Judge: Vincent F. Papalia

**MOTION TO ADMIT IAN R. WINTERS *PRO HAC VICE* PURSUANT  
TO LOCAL DISTRICT COURT RULE 101.1(c)**

Brendan M. Scott, hereby moves (the “Motion”) this Court, pursuant to D. NJ. Local R. Civ. P. 101.1(c) for an order admitting Ian R. Winters *pro hac vice* to appear before this Court in the above-captioned bankruptcy case (the “Case”) of Bed Bath & Beyond Inc. (the “Debtor”) as counsel to Dream on Me Industries, Inc. (the “Dream”), a party in interest in the Case. In support of this Motion, Brendan M. Scott respectfully represents as follows:

1. The undersigned is a Partner with Klestadt Winters Jureller Southard & Stevens, LLP with contact information as follows:

Brendan M.Scott  
Klestadt Winters Jureller Southard & Stevens, LLP  
200 W. 41<sup>st</sup> Street, 17<sup>th</sup> Fl.  
New York, NY 10036  
Tel: (212) 679-5339  
Fax: (212) 972-2245  
E-Mail: bscott@klestadt.com

The undersigned is a member in good standing in the Bar of the State of New Jersey and is admitted to practice before the United States District Court for the District of New Jersey.

2. Ian R. Winters is a partner with Klestadt Winters Jureller Southard Stevens, LLP with contact information as follows:

Ian R. Winters  
Klestadt Winters Jureller Southard & Stevens, LLP  
200 West 41<sup>st</sup> Street, 17<sup>th</sup> Floor  
New York, NY 10036-7203  
Tel: (212) 972-3000  
Fax: (212) 972-2245  
E-Mail: iwinters@klestadt.com

3. Mr. Winters is a member in good standing of the Bar of the State of New York. Mr. Winters was admitted to the Bar of the State of New York in 1994. The name and address of the office that maintains the roll of attorneys for the Bar of the State of New York is:

New York State Unified Court System  
Office of Court Administration  
Attorney Registration Unit  
25 Beaver Street - Room 840  
New York, NY 10004

4. Mr. Winter's Certification in Support of this Motion is attached hereto as Exhibit A in accordance with D. NJ. Local R. Civ. P. 101.1(c) and Mr. Winters is entitled to admission *pro hac vice* in this Case.

5. Mr. Winters has no pending disciplinary complaints against him. He has never been denied admission to, been disciplined by, resigned from, surrendered his license to practice before, or withdrawn an application for admission to practice before this Court or any other court, while facing a disciplinary complaint.

**NOTICE**

6. Notice of this Motion has been given to: (a) the Debtor; (b) the United States Trustee and (c) all appearing parties. In light of the relief requested herein, undersigned counsel submits that no other or further notice is required.

**NO PRIOR REQUEST**

7. No prior request for relief sought in this Motion has been made to this Court or any other court in connection with this Case.

**WHEREFORE**, the undersigned respectfully requests that the Court enter an Order admitting Ian R. Winters *pro hac vice* to appear before this Court in this Case, and granting such other and further relief as the Court may deem proper.

Dated: New York, New York  
July 11, 2023

**KLESTADT WINTERS JURELLER  
SOUTHARD & STEVENS, LLP**

By: /s/Brendan M. Scott

Ian R. Winters (*pro hac vice application pending*)

Brendan M. Scott

Stephanie R. Sweeney (*pro hac vice application pending*)

200 W. 41<sup>st</sup> Street, 17<sup>th</sup> Floor

New York, New York 10036

Tel: (212) 972-3000

Fax: (212) 972-2245

Email: iwinters@klestadt.com

bscott@klestadt.com

ssweeney@klestadt.com

*Counsel to Dream on Me Industries, Inc.*

# **Exhibit A**

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

-----X		
In re:	:	
	:	Chapter 11
BED BATH & BEYOND INC., <i>et al.</i> ,	:	
	:	Case No. 23-13359 (VFP)
Debtors.	:	
-----X		

**CERTIFICATION OF IAN R. WINTERS IN SUPPORT OF  
APPLICATION FOR ADMISSION *PRO HAC VICE*  
PURSUANT TO LOCAL DISTRICT COURT RULE 101.1(c)**

I, Ian R. Winters, hereby certify and state:

1. I am over the age of 18 and believe in the obligations of an oath.
2. I am a partner with the law firm of Klestadt Winters Jureller Southard Stevens, LLP, with an office located at 200 West 41<sup>st</sup> Street, 17<sup>th</sup> Floor, New York, NY 10036-7203.
3. I am a member in good standing of the Bar of the State of New York. I was admitted to the Bar of the State of New York in 1994. The name and address of the office that maintains the roll of attorneys for the Bar of the State of New York is:

New York State Unified Court System  
Office of Court Administration  
Attorney Registration Unit  
25 Beaver Street - Room 840  
New York, NY 10004

4. I have no disciplinary proceedings pending in any jurisdiction and no discipline has previously been imposed on me in any jurisdiction.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on July 11, 2023.

/s/ Ian R. Winters  
Ian R. Winters

# **Exhibit B**

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**KLESTADT WINTERS JURELLER  
SOUTHARD & STEVENS, LLP**

200 West 41<sup>st</sup> Street, 17<sup>th</sup> Floor

New York, New York 10036

Telephone: (212) 972-3000

Facsimile: (212) 972-2245

Ian R. Winters

Brendan M. Scott

Stephanie R. Sweeney

*Counsel to Dream on Me Industries, Inc.*

In re:

BED BATH & BEYOND INC., *et al.*,

Debtors.

Chapter 11

Case No. 23-13359 (VFP)

Judge: Vincent F. Papalia

**ORDER FOR ADMISSION PRO HAC VICE**

The relief set forth on the following page is **ORDERED**.

This matter having been brought before the Court on application for an Order For Admission Pro Hac Vice; and the Court having reviewed the moving papers of the applicant, out-of-state attorney, and considered this matter pursuant to Fed.R.Civ.Proc.78, D.N.J. L.Civ.R.101.1 and D.N.J. LBR 9010-1, and good cause having been shown; it is

ORDERED that Ian R. Winters be permitted to appear pro hac vice; provided that pursuant to D.N.J. L.Civ. R. 101.1(c)(4), an appearance as counsel of record shall be filed promptly by a member of the bar of this Court upon whom all notices, orders and pleadings may be served, and who shall promptly notify the out-of-state attorney of their receipt. Only an attorney at law of this Court may file papers, enter appearances for parties, sign stipulations, or sign and receive payments on judgments, decrees or orders, and it is further

ORDERED that the applicant shall arrange with the New Jersey Lawyers' Fund for Client Protection for payment of the annual fee, for this year and for any year in which the out-of-state attorney continues to represent a client in a matter pending in this Court in accordance with New Jersey Court Rule 1:28-2 and D.N.J. L. Civ. R. 101.1, said fee to be deposited within twenty (20) days of the date of the entry of this Order, and it is further

ORDERED that the \$150.00 fee required by D.N.J. L. Civ. R. 101(c)(3) for pro hac vice admission to the District Court for the District of New Jersey shall also be payable within twenty (20) days of entry of this Order. Payment in the form of a check must be payable to "Clerk, USDC" and forwarded to the Clerk of the United States District Court for the District of New Jersey at the following address:

United States District Court  
District of New Jersey  
Martin Luther King, Jr. Federal Building  
50 Walnut Street  
Newark, N.J. 07102  
*Attention: Pro Hac Vice Admissions*

and it is further ORDERED that the applicant shall be bound by the Local Rules of the United States District Court for the District of New Jersey and the Local Rules of Bankruptcy Procedure for the District of New Jersey; and it is further



ORDERED that the Clerk shall forward a copy of this Order to the Treasurer of New Jersey Lawyers' Fund for Client Protection within 5 days of its date of entry.